

PATENT APPLICATION
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INVENTOR(S): Shell Sterling Simpson, et al. **CONFIRMATION NO:** 4266

SERIAL NO.: 09/905,580 **GROUP ART UNIT:** 2152

FILED: July 12, 2001 **EXAMINER:** Chankong, Dohm

SUBJECT: MEDIATED ACCESS TO PRODUCTION DEVICE OPTIONS
IN A DISTRIBUTED ENVIRONMENT

APPELLANTS'/APPLICANTS' REPLY BRIEF ON APPEAL

The Appellant filed an opening brief on September 13, 2007 and a revised brief on January 2, 2008. Responding, the Examiner mailed an answer on March 26, 2008. The following is a reply to the Examiner's answer.

1. Grounds of Rejection To Be Reviewed.

A. Claims 1-3, 11, 12, 15-17, 25, and 26 stand rejected under 35 USC §103 as being unpatentable over USPN 6,453,127 issued to Wood in view of USPN 6,154,843 issued to Hart.

B. Claims 5, 9, 10, 14, 19, 23, 24, 28, 33, and 34 stand rejected under 35 USC §103 as being unpatentable over Wood in view of Hart and in further view of USPN 6,751,657 issued to Zothner.

C. Claims 35, 36 and 38 stand rejected under 35 USC §103 as being unpatentable over Wood in view of Hart and in further view of Zothner and in further view of USPN 6,092,078 issued to Adolfsson.

2. Argument.

A. Ground For Rejection A – Claims 1-3, 11, 12, 15-17, 25, and 26 stand rejected under 35 USC §103 as being unpatentable over USPN 6,453,127 issued to Wood in view of USPN 6,154,843 issued to Hart.

Claims 1 and 15: Claim 1, as is directed to a method for mediating access to production options and, as amended, recites the following acts.

1. acquiring a user's access request for a production device;
2. accessing data that at least indirectly identifies those production options to which the user does not have permission to access, each production option corresponding to feature that when implemented affects a manner in which the production device produces a target document;

3. retrieving a user interface for the production device, the user interface having user accessible controls for selecting production options for the production device;
4. modifying the retrieved user interface according to the accessed data so that the interface provides user accessible controls for selecting only those options for which the user has permission to access; and
5. presenting the user with the modified user interface

In the opening brief, the Appellant explained that claim 1 recites a method in which a user interface is retrieved. Since the user interface is retrieved, the user interface necessarily must already exist before it can be retrieved. Once retrieved, the interface is modified so that the interface provides user accessible controls for selecting only those options for which the user has permission to access. In other words, the user interface is modified so that the user does not have access to controls for those options for which the user does not have permission to access. The Appellant explained that the references relied upon by the Examiner, even when combined, fail to teach or suggest modifying a retrieved user interface in such a manner.

At page 14 of the answer, the Examiner responded with two arguments. First, the examiner stated:

While Hart does disclose "generating" a user interface, this teaching reads on Appellant's modifying step. Appellant's limitation recites modifying a retrieved user interface to create a new user interface with certain controls accessible to a specific user. That is, a new user interface is generated based on the modification step. Thus, while Appellant attempts to differentiate between modifying a user interface and generating a user interface, there is in fact no functional difference at all since the modifying step in actuality results in generating a user interface.

The Examiner is improperly reading limitations into Claim 1. Claim 1 does not recite "modifying a retrieved user interface to create a new user interface." Instead, Claim 1 recites modifying a retrieved interface. Generating a new interface and modifying an existing interface are NOT functionally equivalent. There is great efficiency in modifying

an existing object such as an interface to suit a particular need rather than generating a new interface from scratch. The efficiency comes from not having to reinvent the wheel. For example, imagine company that has a database of information used for a particular purpose. With a few additions and deletions, that database could be used for a different purpose. Rather than recreating the database as needed for the new purpose, it is more efficient to simply take and modify the existing database for the new purpose. The Appellant respectfully maintains that modifying an existing interface is not equivalent with generating a new interface.

In a second argument, the Examiner noted that Hart's Claim 16 states that the step of dynamically generating a custom user interface includes integrating a minimum set of private network data into said custom user interface. The Examiner mistakenly contends that "there must be an initial user interface into which the data is integrated in order to generate the custom user interface."

Merriam-Webster defines the verb "integrate" as "to combine to form a more complete, harmonious, or coordinated entity. Hart's custom interface is a combination of elements – it is not generated until those elements are combined in a specified fashion. For example, a cupcake is a combination of flour sugar, and other elements. The cupcake does not exist until those elements are integrated in a particular fashion dictated by a given recipe. The cupcake is not modified by integrating the flour. Until all the ingredients are integrated, the cupcake does not exist. Likewise, The Appellant respectfully submits that the act of generating Hart's interface includes the integration of the private network data. Until it is generated, Hart's custom interface does not exist. As such, Hart's act of integrating the private network data is not equivalent to the modification of a retrieved interface.

As such The Appellant respectfully maintains that Hart and Wood fail to teach or suggest "**modifying the retrieved user interface** according to the accessed data so that the interface provides user accessible controls for selecting only those options for which the user has permission to access." For at least these reasons, Claim 1 is patentable over the cited references as are Claims 2, 3, 11, and 12 which depend from Claim 1. Claim 15 is directed to a computer program product that includes a computer

useable medium having computer readable instructions for implementing the method of Claim For at least the same reasons, Claim 1 is patentable, so are Claim 15 and Claims 16, 17, 25, and 26 which depend from Claim 15.

B. Ground For Rejection B – Claims 5, 9, 10, 14, 19, 23, 24, 28, 33, and 34 stand rejected under 35 USC §103 as being unpatentable over Wood in view of Hart and in further view of USPN 6,751,657 issued to Zothner.

Claims 5, 9, and 10 each depend from Claim 1 and are patentable over the cited references based at least on their dependence from Claim 1.

Claims 14 and 28: Claim 14 is directed to a method for mediating access to production options and recites the following:

1. acquiring a user's access request for a production device;
2. retrieving a web page for the production device, the web page having user accessible controls for selecting production options;
3. accessing a record established for the user, the record containing data that at least indirectly identifies those production options to which the user does not have permission to access, each production option corresponding to feature that when implemented affects a manner in which the production device produces a target document; and
4. modifying the retrieved web page according to the user's record so that the web page provides user accessible controls for only those options for which the user has permission to access; and
5. presenting the user with the modified web page so that through the web page the user can cause the production of the target document by the production device in accordance with a selection of one or more of the user accessible controls provided by the user interface..

Claim 28 is directed to a computer program product that includes a computer useable medium having computer readable instructions for performing the elements listed above.

As discussed above with respect to Claims 1 and 15, Wood and Hart fail to teach or suggest "modifying the retrieved web page according to the user's record so that the web page provides user accessible controls for only those options for which the user has permission to access." Zothner is also silent on this point. For at least the same reasons Claims 1 and 15 are patentable, so are Claims 14 and 28.

Claims 19, 23, and 24 each depend from Claim 15 and are patentable over the cited references based at least on their dependence from Claim 15.

Claim 33: Claim 33 is directed to a system for managing electronic document production and, as amended, recites the following elements:

1. a production server operable to serve to a client an interface having user accessible controls for selecting production options for a target document, each production option corresponding to feature that when implemented affects a manner in which a selected production device produces a target document;
2. a permission service operable to retrieve the interface from the production server for the selected production device, access a user's record containing data that at least indirectly identifies those production options to which the user does not have permission to access, modify the retrieved interface according to the user's record so that the modified interface has user accessible controls for only those options for which the user has permission to access, and direct to the client the modified interface so that through the interface the user can cause the production of the target document by the selected production device in accordance with a

selection of one or more of the user accessible controls provided by the modified interface.

As discussed above with respect to Claims 1 and 15, Wood and Hart fail to teach or suggest "modifying the retrieved web page according to the user's record so that the web page provides user accessible controls for only those options for which the user has permission to access." Zothner is also silent on this point. Consequently, the cited references also fail to teach or suggest a permission service that is operable to modify the retrieved interface according to the user's record so that the modified interface has user accessible controls for only those options for which the user has permission to access. For at least the same reasons Claims 1 and 15 are patentable, so are Claim 33 and Claim 34 which depends from Claim 33.

C. Ground For Rejection C – Claims 35, 36 and 38 stand rejected under 35 USC §103 as being unpatentable over Wood in view of Hart and in further view of Zothner and in further view of USPN 6,092,078 issued to Adolfsson.

Claims 35 and 36 each depend from Claim 33 and include all of the limitations of that base claim. For at least the same reasons Claim 33 is patentable, so are Claims 35 and 36.

Claim 38: Claim 38 is directed to a system for managing electronic document production and includes the following combination of elements:

1. a production device;
2. one or more user records, each user record containing, for each production device, data that at least indirectly identifies those production options to which the user does not have permission to access, each production option corresponding to feature that when implemented affects a manner in which the production device produces a target document;

3. a production server in communication with the production device and operable to serve an interface for that production device, the interface having user accessible controls for selecting production options for the production device;
4. a permission service operable to access the user's record, retrieve the interface from the production server, modify the retrieved interface according to the user's record so that the modified interface has user accessible controls for only those options for which the user has permission to access, and to direct to a client the modified interface so that through the modified interface the user can cause the production of the target document by the selected production device in accordance with a selection of one or more of the user accessible controls provided by the modified interface;
5. one or more device records, each device record containing data representing the production options offered by the production device;
6. a permission engine operable to parse the device records and generate an web page for managing user records;
7. a device locator operable to detect new production devices; and
8. an update service operable to create a device record for each newly detected production device.

As discussed above with respect to Claims 1 and 15, Wood and Hart fail to teach or suggest "modifying the retrieved web page according to the user's record so that the web page provides user accessible controls for only those options for which the user has permission to access." Zothner and Adolfsson are also silent on this point. Consequently, the cited references also fail to teach or suggest a permission service that is operable to modify the retrieved interface according to the user's record so that the modified interface has user accessible controls for only those options for which the user has permission to access. For at least the same reasons Claims 1 and 15 are patentable, so is Claim 38.

8. Conclusion.

In view of the foregoing remarks and amendments, Applicant respectfully submits that Claims 1-3, 5, 9-12, 14-17, 19, 23-26, 28, 33-36, and 38 define allowable subject matter.

Respectfully submitted,
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APPENDIX OF CLAIMS INVOLVED IN THE APPEAL

1. (previously presented) A method for mediating access to production options, comprising:

acquiring a user's access request for a production device;

accessing data that at least indirectly identifies those production options to which the user does not have permission to access, each production option corresponding to feature that when implemented affects a manner in which the production device produces a target document;

retrieving a user interface for the production device, the user interface having user accessible controls for selecting production options for the production device;

modifying the retrieved user interface according to the accessed data so that the interface provides user accessible controls for selecting only those options for which the user has permission to access; and

presenting the user with the modified user interface.

2. (original) The method of Claim 1, wherein the act of acquiring comprises intercepting an access request directed to the production device.

3 (original) The method of Claim 1, wherein the act of acquiring comprises redirecting the access request.

4. (cancelled)

5. (previously presented) The method of Claim 1, wherein the act of accessing comprises obtaining credentials for the user and locating a user record using the credentials, the user record containing the data that at least indirectly identifies those production options to which the user does not have permission to access.

6. (cancelled)

7. (cancelled)

8. (cancelled)

9. (previously presented) The method of Claim 1, wherein the interface is a web page containing instructions for displaying controls for selecting production options and wherein the instructions are associated with one or more tags each tag identifying a particular production option, wherein the act of altering comprises identifying the tags for production options to which the user does not have access and altering the instructions associated with those tags.

10. (previously presented) The method of Claim 1, wherein the act of accessing comprises obtaining credentials for the user and locating a record for the user using the credentials, the record containing the data that at least indirectly identifies those production options to which the user does not have permission to access.

11. (previously presented) The method of Claim 1, wherein the acts of retrieving and modifying are performed on a network device other than the production device.

12. (previously presented) The method of Claim 1, wherein the act of retrieving comprises retrieving the interface in the form of a web page, and the act of presenting comprises presenting the modified web page to a web browser.

13. (cancelled)

14. (previously presented) A method for mediating access to production options, comprising:

acquiring a user's access request for a production device;

retrieving a web page for the production device, the web page having user accessible controls for selecting production options;

accessing a record established for the user, the record containing data that at least indirectly identifies those production options to which the user does not have permission to access, each production option corresponding to feature that when implemented affects a manner in which the production device produces a target document; and

modifying the retrieved web page according to the user's record so that the web page provides user accessible controls for only those options for which the user has permission to access; and

presenting the user with the modified web page so that through the web page the user can cause the production of the target document by the production device in accordance with a selection of one or more of the user accessible controls provided by the user interface.

15. (previously presented) A computer program product for mediating access to production options, the product comprising a computer useable medium having computer readable instructions thereon for:

acquiring a user's access request for a production device;

accessing data that at least indirectly identifies those production options to which the user does not have permission to access, each production option corresponding to feature that when implemented affects a manner in which the production device produces a target document;

retrieving a user interface for the production device, the user interface having user accessible controls for selecting production options for the production device;

modifying the retrieved user interface according to the accessed data so that the interface provides user accessible controls for selecting only those options for which the user has permission to access; and

presenting the user with the modified user.

16. (previously presented) The product of Claim 15, wherein the instructions for acquiring include instructions for intercepting an access request directed to the production device.

17. (previously presented) The product of Claim 15, wherein instructions for acquiring include instructions for redirecting the access request.

18. (cancelled)

19. (previously presented) The product of Claim 15, wherein the instructions for accessing comprise instructions for obtaining credentials for the user and locating a user record using the credentials, the user record containing the data that at least indirectly identifies those production options to which the user does not have permission to access.

20. (cancelled)

21. (Cancelled)

22. (cancelled)

23. (previously presented) The product of Claim 15, wherein the interface is a web page containing instructions for displaying the controls for selecting each of the production options and wherein the instructions are associated with one or more tags each tag identifying a particular production option, wherein the instructions for altering include instructions for identifying the tags for production options to which the user does not have access and altering the instructions associated with those tags.

24. (previously presented) The product of Claim 15, wherein the instructions for accessing include instructions for obtaining credentials for the user and locating a user

record using the credentials, the user record containing the data that at least indirectly identifies those production options to which the user does not have permission to access.

25. (previously presented) The product of Claim 15, wherein the instructions for retrieving and modifying comprise instructions for retrieving and modifying from a device other than the production device.

26. (previously presented) The product of Claim 15, wherein the instructions for retrieving comprises instructions for retrieving the interface in the form of a web page and the instructions for presenting comprises instructions for presenting the web page to a web browser.

27. (Cancelled)

28. (previously presented) A computer program product for mediating access to production devices, the product comprising a computer useable medium having computer readable instructions thereon for:

- acquiring a user's access request for a production device;
- retrieving a web page for the production device; the interface having user accessible controls for selecting production options for the production device;
- accessing a record established for the user, the record containing data that at least indirectly identifies those production options to which the user does not have permission to access, each production option corresponding to feature that when implemented affects a manner in which the production device produces a target document;
- modifying the retrieved web page according to the accessed data, the altered web page having user accessible controls for only those production options for which the user has permission to access; and

presenting the user with the modified web page so that through the web page the user can cause the production of the target document by the production device in accordance with a selection of one or more of the user accessible controls provided by the user interface.

29. (Cancelled)

30. (Cancelled)

31-32 (cancelled)

33. (previously presented) In a computer network, a system for managing electronic document production, the system comprising:

- a production server operable to serve to a client an interface having user accessible controls for selecting production options for a target document, each production option corresponding to feature that when implemented affects a manner in which a selected production device produces a target document;

- a permission service operable to retrieve the interface from the production server for the selected production device, access a user's record containing data that at least indirectly identifies those production options to which the user does not have permission to access, modify the retrieved interface according to the user's record so that the modified interface has user accessible controls for only those options for which the user has permission to access, and direct to the client the modified interface so that through the interface the user can cause the production of the target document by the selected production device in accordance with a selection of one or more of the user accessible controls provided by the modified interface.

34. (previously presented) The system of Claim 33, further comprising a permission engine operable to generate an interface having user accessible controls for managing user records.

35. (original) The system of Claim 34, further comprising one or more device records, each device record containing data representing the production options offered by the particular production device, and wherein the permission engine is operable to parse the device records to generate the interface for managing the user records.

36. (original) The system of Claim 35, further comprising:
a device locator operable to detect new production devices; and
an update service operable to create a device record for each newly detected production device.

37. (Cancelled)

38. (previously presented) In a computer network, a system for managing electronic document production, the system comprising:

a production device;

one or more user records, each user record containing, for each production device, data that at least indirectly identifies those production options to which the user does not have permission to access, each production option corresponding to feature that when implemented affects a manner in which the production device produces a target document;

a production server in communication with the production device and operable to serve an interface for that production device, the interface having user accessible controls for selecting production options for the production device;

a permission service operable to access the user's record, retrieve the interface from the production server, modify the retrieved interface according to the user's record so that the modified interface has user accessible controls for only those options for which the user has permission to access, and to direct to a client the modified interface so that through the modified interface the user can cause the production of the target

document by the selected production device in accordance with a selection of one or more of the user accessible controls provided by the modified interface;

one or more device records, each device record containing data representing the production options offered by the production device;

a permission engine operable to parse the device records and generate an web page for managing user records;

a device locator operable to detect new production devices; and

an update service operable to create a device record for each newly detected production device.